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INTERNATIONAL, INC.; MENZIES AVIATION
(USA), INC.; TRACY AGUILAR

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

GEARY SHA, an individual,

Plaintiff,

vs.

AIRCRAFT SERVICE INTERNATIONAL,
INC., a Delaware corporation; MENZIES
AVIATION (USA), INC., a Delaware
corporation; TRACY AGUILAR, an individual;
and DOES 1 through 50, inclusive,

Defendants.

Case No. 3:24-cv-01738

**DECLARATION OF KEVIN JACKSON IN
SUPPORT OF DEFENDANT AIRCRAFT
SERVICE INTERNATIONAL, INC.'S
NOTICE OF REMOVAL OF ACTION 28
U.S.C. § 1332 (DIVERSITY JURISDICTION)**

DECLARATION OF KEVIN JACKSON

I, Kevin Jackson, declares as follows:

1. I am an attorney admitted to practice law before this Court. I am Senior Counsel with the law firm of Foley & Lardner LLP, counsel of record for Aircraft Service International, Inc. (“ASI”), Menzies Aviation (USA), Inc. (“Menzies”), and Tracy Aguilera (“Aguilera”) ¹ (collectively, “Defendants”) in the above-entitled matter. I am admitted to practice in the United States District Court for the Northern District of California. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, I could and would testify competently and under oath to the following facts.

2. I am informed and believe that Plaintiff Geary Sha (“Plaintiff”) filed a Complaint in the matter of *Geary Sha v. Aircraft Services International, Inc., et al.*, Case No. CGC-23-606989 (Superior Court of the State of California, County of San Francisco) on or about June 9, 2023. A true and correct copy of the Complaint is attached hereto as **Exhibit A**.

3. On June 14, 2023, I received an email from Plaintiff’s counsel that included copies of a Notice and Acknowledgement of Receipt for Menzies and Aguilera, along with the Complaint, Summons, Civil Cover Sheet, and ADR Information Package. True and correct copies of the foregoing are attached hereto as **Exhibits B and C**.

4. On or about June 16, 2023, ASI informed me that it was served with the Complaint.

5. On July 5, 2023, my office returned a completed Notice and Acknowledgement of Receipt on behalf of Menzies and Aguilera via email to Plaintiff’s counsel. Conformed copies of the foregoing are attached hereto as **Exhibits D and E**.

6. On August 4, 2024, my office, on behalf of Defendants, issued a Notice of Deposition of Plaintiff for September 19, 2023, at 10:00 a.m., and subsequently met and conferred with Plaintiff’s counsel to ultimately select a mutually agreeable deposition date of February 6, 2024. A true and correct copy of the Notice of Deposition is attached hereto as **Exhibit F**.

7. On September 29, 2023, I received an email from Plaintiff’s counsel’s office with Plaintiff’s verified Responses to Defendants’ Special Interrogatories, Set One. A true and correct copy

¹ Plaintiff erroneously named Tracy Aguilera as “TRACY AGUILAR.”

of Plaintiff's verified Responses to Defendants' Special Interrogatories, Set One is attached hereto as **Exhibit G**.

8. On February 6, 2024, I took the deposition of Plaintiff via videoconference on behalf of Defendants.

9. On February 19, 2024, I received a certified transcript of Plaintiff's February 6, 2024 deposition from Aptus Court Reporting. A true and correct copy of the transmittal letter regarding the same is attached hereto as **Exhibit H**.

10. True and correct copies of relevant excerpts from the certified transcript of Plaintiff's deposition are attached hereto as **Exhibit I**.

11. A true and correct copy of the document marked as Exhibit 22 at Plaintiff's Deposition is attached hereto as **Exhibit J**.

12. A true and correct copy of the state court docket in the Superior Court of the State of California, County of San Francisco, is attached to the Jackson Declaration as **Exhibit K**.

13. True and correct copies of all process and pleadings filed with the San Francisco Superior Court are attached to the Jackson Declaration as **Exhibit L**.

14. ASI is filing with the Clerk of the San Francisco Superior Court, in which this action is currently pending, a Notice of Filing Notice of Removal, together with this Notice of Removal and supporting documents, pursuant to 28 U.S.C. section 1446(d). The Notice of Filing Notice of Removal together with this Notice of Removal are also being served on Plaintiff pursuant to 28 U.S.C. section 1446(d).

I declare under penalty of perjury, under the laws of the State of California that the foregoing is true and correct.

Executed this 20th day of March, 2024, in San Diego, California.

/s/ Kevin Jackson
KEVIN JACKSON